



# **Privacy Impact Assessment (PIA)**

## **Management of Ag Credit System (MAC)**

**Revision: 1.06**



**Farm Service Agency**

**Date: *July 31, 2009***



## Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	July	Scott Tanos	<i>Initial version</i>
1.02	July 8, 2009	D. Brizendine ISO	Updated Sections 3,4,5 from previous doc
1.03	July 22, 2009	D.Brizendine ISO	Updated System Owner Information
1.04	July 23, 2009	D.Brizendine	Updated questions 24.25,26,26.1
1.05	July 24, 2009	R.Moody	Completed questionnaire
1.06	July 31, 2009	D.Brizendine	Updated response 2.1, 26; Document review; template updates



## Table of Contents

<b>1</b>	<b>PURPOSE OF DOCUMENT .....</b>	<b>1</b>
<b>2</b>	<b>SYSTEM INFORMATION .....</b>	<b>2</b>
<b>3</b>	<b>DATA INFORMATION .....</b>	<b>3</b>
<b>3.1</b>	<b>Data Collection .....</b>	<b>3</b>
<b>3.2</b>	<b>Data Use .....</b>	<b>4</b>
<b>3.3</b>	<b>Data Retention.....</b>	<b>6</b>
<b>3.4</b>	<b>Data Sharing.....</b>	<b>6</b>
<b>3.5</b>	<b>Data Access.....</b>	<b>7</b>
<b>3.6</b>	<b>Customer Protection.....</b>	<b>8</b>
<b>4</b>	<b>SYSTEM OF RECORD .....</b>	<b>10</b>
<b>5</b>	<b>TECHNOLOGY .....</b>	<b>11</b>
<b>6</b>	<b>COMPLETION INSTRUCTIONS .....</b>	<b>12</b>

# 1 Purpose of Document

USDA DM 3515-002 states: “Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner’s requirements presents any threats to privacy.”

The Privacy Impact Assessment (PIA) document contains information on how the **Management of Ag Credit System (MAC)** affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems*.



## 2 System Information

System Information	
Agency:	Farm Service Agency (FSA)
System Name:	Management of Ag Credit System
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	Management of Agricultural Credit System (MAC) records and reports borrower, loan application, loan closing and loan servicing information. It is a decision support tool that provides information to the county personnel to send service letters to borrowers, records loan servicing activities, provides documentation, and assists decision making officials with reports for Congress.
Who owns this system? (Name, agency, contact information)	Nancy New USDA/FSA/DAFLP/PDEED (202) 720-7719 <a href="mailto:nancy.new@wdc.usda.gov">nancy.new@wdc.usda.gov</a>
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue, SW Washington, D.C. 20250 (202) 720-2419 <a href="mailto:brian.davies@wdc.usda.gov">brian.davies@wdc.usda.gov</a>
Who completed this document? (Name, agency, contact information)	Russell Moody (816) 926-6845 <a href="mailto:russell.moody@kcc.usda.gov">russell.moody@kcc.usda.gov</a>



## 3 Data Information

### 3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Customer-Name, Social Security Number, Financial Information, loan information, Farm production information, Liabilities, assets owned, tax id, employees name
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	7 U.S.C. 135b, 450j, 450k, 405l, 1281-1393, 1421-1449, 1461-1469, 1471-1471i, 1781-1787; 15 U.S.C. 714-714p; 16 U.S.C. 590a-590q, 1301- 1311, 1501-1510, 1606, 2101-2111, 2201-2205, 3501, 3801-3847, 4601, 5822; 26 U.S.C. 6109; 40 U.S.C. App. 1, 2, 203; 43 U.S.C. 1592; and 48 U.S.C. 1469
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	Agencies: FSA, NRCS, IRS, Geological Survey, NASS and Commerce, RD Application Data: Customer Tax records, credit reports, SCIMS, creditors, banks, GLS, customer case file, IRS, RMA, DPH Database, yield records, crop insurance company records, USDA statistics. Public records, MAC, FBP, GLS, MRT, PLAS, ADPS.
4.1	What data is being collected from the customer?	Service Center employee (employees name or id is collected as part of the process) enters the information given to them from the customer, credit info, other financial data, assets, production info, historical business info, SSN, Tax ID, Property info, community info, farm tract info, livestock/crop info,



No.	Question	Response
4.2	What USDA agencies are providing data for use in the system?	SCIMS, WebEquity, FBP, ADPS, MAC, RD status information, OIP- employee access, NASS, GIS, Internal FLPIDS databases owned by FCAO and Master References Tables owned by EDMSO. FSA,
4.3	What state and local agencies are providing data for use in the system?	County offices, Tax records, Courthouse Records (UCC filings), Deed Recorder
4.4	From what other third party sources is data being collected?	Other lenders, credit reporting agencies, private appraisers, Crop insurance companies, multi list data, Farm Credit System, sales data. Ag Lenders, business owners
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Data is verified manually, Use 3 FLP, verify employment, lenders, tax records(IRS) MAC depends on the accuracy of the information given from the sources, summary data is calculated, employees manually check for completeness.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data is verified manually, Use 3 FLP, verify employment, lenders, tax records(IRS) MAC depends on the accuracy of the information given from the sources, summary data is calculated, employees manually check for completeness.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data is verified manually, Use 3 FLP, verify employment, lenders, tax records(IRS) MAC depends on the accuracy of the information given from the sources, summary data is calculated, employees manually check for completeness.

### 3.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	Data is used to determine qualifications for participation in FSA's Farm Loan Programs



No.	Question	Response
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input checked="" type="checkbox"/> Yes – improved analysis <input type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	Spot check, audits, manual verification, system tested calculations.
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	Data is used to determine qualifications for participation in FSA's Farm Loan Programs
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.





No.	Question	Response
12.1	What controls are in place to protect the data and prevent unauthorized access?	User ID and Password. Through eAuth and EAS or within the system.
13	Are processes being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	User ID and Password. eAuth and EAS or within the system.

### 3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 15. Data is stored indefinitely. Some exists until the user is deleted from the database. 5 Years on average for some systems FSA 25-AS Handbook. Follow procedures in FSA 25-AS Handbook
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Data is locked down. Data is evaluated by user determination. Reports can be run as a check.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

### 3.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	



No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	In reference to S36 applications. Centrally managed distribution with the same releases to all sites.

### 3.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	FSA employees, Users, managers and system administrators, developers, loan employees, State, County, National offices, will have access to system data.
21	How will user access to the data be determined?	Access if determined by user ID and password, following standard agency procedures. Role based access is built in.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	Access is determined by roles. Some systems allow state/county access only, some have database passwords, National users may have unrestricted access.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



No.	Question	Response
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Electronic signature of who made changes, Essential data is locked down, eAuth and web system does not allow browsing, Password protection of database, security training/policies/procedures and handbooks on proper use.

### 3.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	USDA Privacy Office
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	By contacting John Underwood, Privacy Officer, at <a href="mailto:john.underwood@kcc.usda.gov">john.underwood@kcc.usda.gov</a> & 816.926.6992
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. Common FSA incident reporting process. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	FSA guidelines for fair and equitable treatment already exist. Automated consideration or uniform calculations of all available options.



No.	Question	Response
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30 None as long as employee abide by the rules of behavior. The exception would be: User error.
29.1	Explain	

## 4 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data will be retrieved by User ID and Password. Customer data once in the application could be retrieved by SS#, Tax ID, customer number, system assigned identifiers.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at <a href="http://www.access.GPO.gov">www.access.GPO.gov</a> .)	USDA/FSA-2 Farm Records File Automated USDA/FSA-14 Applicant/Borrower
30.3	If the system is being modified, will the SOR require amendment or revision?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Possibly if the modification results in data, record storage location, or routine use that is not covered by the SORN identified above.

## 5 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



## 6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

**1. Yes.**

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.